

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNION DEL PUEBLO ENTERO, et al., §
Plaintiffs, §
§
v. §
§
GREGORY W. ABBOTT, et al., §
Defendants. §

**CIVIL ACTION NO:
5:21-CV-0844-XR**

**DALLAS COUNTY JOINS SUBSTANTIVE SCOPE OF DISCOVERY
PORTION OF JOINT MOTION TO CLARIFY SCHEDULING ORDER**

TO THE HONORABLE JUDGE OF SAID COURT:

The undersigned was unavailable due to a medical procedure to confer with other parties on the Joint Motion to Clarify Scheduling Order, ECF 542, before it was filed with the Court this morning.

Dallas County joins with the request of Bexar, El Paso, Harris, Hidalgo, and Travis Counties to request that any order on the Joint Motion to Clarify Scheduling Order, ECF No. 542, makes clear that the scope of discovery to which they are currently subject remains confined to “matters relating to the November 2022 general election” as set forth in the Court’s Amended Scheduling Order of June 8, 2022. ECF No. 437, Am. Scheduling Order at 2. Dallas County also joins with Bexar, El Paso, Harris, Hidalgo, and Travis Counties to state that any written discovery served on or depositions taken of county defendants should remain confined to “matters *relating to* the November 2022 general election.” ECF No. 437, Am. Scheduling Order at 2 (emphasis added). Dallas County also joins with Bexar, El Paso, Harris, Hidalgo, and Travis Counties to object to written discovery or deposition questioning to the extent any other party asserts that such written discovery or deposition questioning should extend beyond that scope.

Respectfully submitted,

JOHN CREUZOT
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CERTIFICATE OF SERVICEError! Bookmark not defined.

I, hereby certify that the foregoing document was filed electronically on February 27, 2023, with the Clerk of the Court for the Western District of Texas by using the CM/ECF system, causing electronic service upon all counsel of record.

/s/ Ben L. Stool

Assistant District Attorney